
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**

 v. : **Mag. No. 19-7313**

EDUARDO PEREZ :


I, Wilson Rodriguez, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Postal Inspector with the United States Postal Inspection Service, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Wilson Rodriguez, Postal Inspector
United States Postal Inspection Service

Sworn to before me and subscribed in my presence,

July 22, 2019 at Newark, New Jersey
Date City and State



Honorable Cathy L. Waldor
United States Magistrate Judge

ATTACHMENT A

On or about June 22, 2019, in Hudson County, in the District of New Jersey, and elsewhere, defendant

EDUARDO PEREZ

did forcibly assault, resist, oppose, impede, intimidate, and interfere with Victim 1, a person designated in Title 18, United States Code, Section 1114, namely, a postal worker employed by the United States Postal Service, while Victim 1 was engaged in and on account of the performance of Victim 1's official duties, involving bodily contact and inflicting bodily injury.

In violation of Title 18, United States Code, Section 111(a)(1) and (b), and Section 2.

ATTACHMENT B

I, Wilson Rodriguez, am a Postal Inspector with the United States Postal Inspection Service ("USPIS"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and evidence. Where statements of others are related herein, they are related in substance and part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation.

1. At all times relevant to this Complaint, defendant Eduardo Perez was a resident of Hudson County, New Jersey.

2. On or about June 22, 2019, Victim 1 was working as a letter carrier for the United States Postal Service ("USPS"), operating out of the United States Post Office located at 7915 Bergenline Avenue in North Bergen, New Jersey (the "Woodcliff Station").

3. The parking lot for the Woodcliff Station has an entrance at one side (the "Entrance") and an exit at the other side (the "Exit"). It is the policy of the Woodcliff Station that the first letter carrier to return to the station at the end of the day should enter the parking lot through the Exit and block the Entrance with his or her postal vehicle, to prevent non-postal vehicles from entering the lot after the station is closed.

4. In compliance with that policy, when Victim 1 returned to the Woodcliff Station at approximately 5:40 p.m. on or about June 22, 2019, after completing his route, he entered the parking lot through the Exit and parked his postal vehicle in the station's driveway, blocking the Entrance. As he did so, Victim 1 noticed a white pickup truck (the "White Pickup Truck") parked in a "Restricted Parking Employees Only" space in the lot, near the entrance. Victim 1 then began unloading parcels from his postal vehicle and loading the vehicle with more parcels to be delivered.

5. At approximately 5:45 p.m., a supervisor inside the Woodcliff Station heard shouting coming from the direction of the parking lot. The supervisor walked outside and observed several individuals near the White Pickup Truck parked near the now-obstructed Entrance. The individuals were angrily demanding that USPS employees move the postal vehicle obstructing the Entrance, to allow the White Pickup Truck to exit the lot via the Entrance (despite the fact that the Exit remained unobstructed). The supervisor informed the individuals that if they did not move the White Pickup Truck out of the lot via the Exit, he would call the police and/or a towing service.

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6. The supervisor then observed one of the individuals, later identified as defendant EDUARDO PEREZ ("PEREZ"), enter the White Pickup Truck and accelerate quickly in reverse toward the Exit, nearly striking a postal worker in the process. The White Pickup Truck then left the lot through the Exit, and, as it was doing so, the supervisor photographed the White Pickup Truck, including its license plate.

7. Upon exiting the lot, the White Pickup Truck circled the block and returned to the Woodcliff Station parking lot Entrance, which was still blocked by Victim 1's postal vehicle. As Victim 1 continued loading and unloading parcels from his vehicle, PEREZ got out of the White Pickup Truck and was joined by several of the other individuals who were still in the vicinity, and PEREZ shouted a racial slur at Victim 1. Victim 1 jogged a few steps toward the Woodcliff Station, away from PEREZ, and then returned to his vehicle.

8. As Victim 1 returned to his postal vehicle, PEREZ and his companions surrounded Victim 1. Several of PEREZ's companions then held Victim 1 while PEREZ swung his fist repeatedly toward Victim 1 and punched Victim 1 in the face. The attack caused Victim 1 to fall backward against his postal vehicle and then to the ground, knocking him unconscious. The supervisor, who witnessed the attack, called the police, whereupon PEREZ immediately left the scene in the White Pickup Truck.

9. When law enforcement arrived, the supervisor provided them with the photograph he had taken of the White Pickup Truck and its license plate. Law enforcement then ran a records check on the plate number and determined that the White Pickup Truck was registered to PEREZ. Law enforcement showed Victim 1 a photograph of PEREZ at the scene, and Victim 1 positively identified PEREZ as the man who had attacked him. Victim 1 was then transported by ambulance to a hospital, where he was treated for serious injuries to his face and head.

10. On or about June 26, 2019, Victim 1 viewed a lineup of six photographs, shown one at a time, and identified a photograph of PEREZ, with 100 percent certainty, as depicting his attacker.

11. Law enforcement has since obtained closed-circuit video footage captured by security cameras outside the Woodcliff Station, which shows the attack and PEREZ fleeing the scene afterward in the White Pickup Truck.